

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

JACK VENTOLA,

Defendant.

Criminal No. 15-cr-10356 (DPW)

**THIRD-PARTIES MICHAEL BRUNO'S  
AND MARIE BRUNO'S MOTION TO QUASH**

Pursuant to Federal Rule of Criminal Procedure 17(c)(2), Michael Bruno and Marie Bruno (the “Brunos”), by and through their attorney, hereby move to quash the subpoenas (collectively, the “Subpoenas”) to produce documents issued by the defendant, Jack Ventola (“Ventola” or the “Defendant”), in the above-captioned matter because the Subpoenas are unreasonable and oppressive.<sup>1</sup>

The Subpoenas must be quashed in their entirety because they are overly broad discovery devices that cannot possibly be limited to admissible and relevant evidence, and are also premature because Rule 16 discovery is ongoing and no trial has been scheduled or is likely to be scheduled soon.

Additionally, it is improper for Ventola to have issued the Subpoenas ex parte and under seal, and they should be unsealed.

In support of this Motion, the Brunos rely upon the accompanying memorandum of law.

**WHEREFORE**, the Brunos respectfully request that the Court: (1) grant their motion to

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<sup>1</sup> The Subpoenas are attached as Exhibit A to the accompanying memorandum of law.

quash the Subpoenas; (2) unseal the Subpoenas; and (3) grant such other relief as the Court deems just and appropriate.

Respectfully submitted,

MICHAEL BRUNO AND MARIE  
BRUNO,  
By their counsel,

/s/ Christopher L. Nasson

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Dated: April 18, 2017

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

As reflected herein, the undersigned conferred with counsel for Ventola in a good faith attempt to narrow or resolve the issues raised by this motion.

/s/ Christopher L. Nasson

Christopher L. Nasson

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was filed through the Electronic Court Filing system on April 18, 2017, and a copy thereof will be sent electronically to the registered recipients and counsel of record as identified on the Notice of Electronic Filing.

/s/ Christopher L. Nasson

Christopher L. Nasson